

# **EXHIBIT A**

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**LAW OFFICES OF GENE MESH AND ASSOCIATES**

7 September 2004

TO ALL COUNSEL ON THE ATTACHED SERVICE LIST

**Re: OHSL**

Dear Counsel:

I would like to begin the discussion on where and when expert discovery will take place. It seems that it makes sense to do some of the depositions, such as Messr. Schoenblum, Ms. Preston, and Dr. Lutz in New York City. Dr. Walker can be deposed here in Cincinnati, and Dr. Fuerman can likely be deposed in the Massachusetts area.

Kindly let me know what type of time frame you had in mind. I intend to depose your experts as soon as possible after I receive the expert reports.

Thank you for your cooperation.

Sincerely,



Michael G. Brautigam

cc: All Counsel by Fax

2605 Burnet Avenue  
at Taft Road  
Cincinnati, Ohio 45219-2502

TELEPHONE  
(513) 221-8800

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**LAW OFFICES OF GENE MESH AND ASSOCIATES**

15 September 2004

By Fax 579 6457

James E. Burke, Esq.  
KEATING, MUETHING & KLEKAMP, P.L.L.  
1400 Provident Tower  
One East Fourth Street  
Cincinnati, Ohio 45202-3752

**Re: OHSL**

Dear Mr. Burke:

In an attempt to get the ball rolling, I offer the following dates in Manhattan for the expert depositions. This schedule is based on your needing no more than a single day for each expert, although if you anticipate that you will need more we can certainly move the dates around. Also, we are happy to begin and end at any reasonable time that you prefer.

Bill Lutz—Thursday 21 October 2004  
Candace Preston—Friday 22 October 2004  
Erv Schoenblum—Monday 25 October 2004  
Ross Fuerman—Tuesday 26 October 2004

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I have not yet heard from UC Professor Mike Walker, but I believe that he will likely be the easiest one to schedule due to the logistics. As soon as I hear from Dr. Walker, I will get back to you.

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Thank you for your cooperation.

Sincerely,



Michael G. Brautigam

cc: All Counsel by Fax

